

W.K Vs. Red Roof Inns, Inc.

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

PL Sum. J.**Ex. 010**

W.K., E.H., M.M, R.P., M.B.,
D.P., A.F., C.A., R.K., K.P.,
and T.H.,

Plaintiffs,

vs.

CIVIL ACTION NO.:

1:20-CV-05263-MHC

RED ROOF INNS, INC., et al.,
Defendants.

JANE DOE 1-4,
Plaintiffs,

vs.

CIVIL ACTION NO.:

1:20-CV-04278-WMR

RED ROOF INNS, INC., et al.,
Defendants.

VIDEOTAPED DEPOSITION OF R.P.

April 14, 2022

9:45 a.m.

1960 Satellite Boulevard, Suite 4000

Duluth, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

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20 Also Present:

21 Samantha Girschick (via Zoom)

22

23

24

25

1 now, but...

2 Q Were you diagnosed with any type of
3 psychological or mental disorders before you --

4 A Yes, sir.

5 Q -- started being trafficked?

6 A Yes, sir.

7 Q What was that?

8 A Bipolar, bipolar 1.

9 Q Bipolar 1?

10 A Yes, sir.

11 Q And how long would your manic episodes
12 last?

13 A They weren't as bad then. Like when I was
14 younger, they weren't as bad as when I got older.
15 So I didn't really have -- I just -- I didn't
16 really have many manic episodes, but when I turned
17 18, I had a lot, like, after that. From 18, I've
18 had a lot of problems.

19 Q Now, the mania -- what's worse, the manic
20 or the depressive for you?

21 A The depressive one.

22 Q Okay. And which one lasts longer?

23 A The manic one.

24 Q And how long does -- how long does your
25 mania last?

1 A Well, I've gone through an episode where
2 it lasted three months one time. Like when I was
3 in the mental hospital, a couple -- it was in
4 2021 -- I mean, 2021. I said 2000. 2021. I was
5 in the hospital, and I really literally -- I wasn't
6 even on drugs. I stayed up for -- it made me stay
7 up for like maybe one or two months, like, whole,
8 like, I really didn't get any rest and I was just
9 manic. And I was just going crazy, doing crazy
10 things, thinking my past was going to come up.
11 Like I literally thought someone was out to get me.
12 It was -- it was crazy.

13 Q How old were you when you were diagnosed
14 with BP 1?

15 A I was -- I was 14, 15, when I got
16 diagnosed with bipolar.

17 Q When you were diagnosed back in your early
18 teenage years, were you put on medicine?

19 A Yes, sir.

20 Q Which one?

21 A I think they put me on Lamictal then --
22 no. Something like that, I think it was called
23 Lamictal, some kind of pill like that. But I
24 didn't want to take them because they made me
25 feel -- and Geodon -- because they made me feel

1 down or --

2 A Yes, I wrote it down.

3 Q So it says --

4 MR. KEITH: What number are we up to,
5 Elliott?

6 (Defendants' RP-6 marked.)

7 BY MR. KEITH:

8 Q All right. I'll mark this as 6. When did
9 you write this down?

10 A Yesterday.

11 Q In what context? Were you --

12 A I was just writing little notes because
13 that's how long -- I was trying to remember the
14 days and which trafficker was which one.

15 Q So you wrote this -- you wrote this down
16 so that you could remember the dates and the times
17 for the hotels --

18 A Yes.

19 Q -- so that you could testify based on
20 this?

21 A Yes, yes, sir.

22 Q Okay. And was this while you were meeting
23 with Pat?

24 A Yes, sir.

25 Q Okay. So it says Smyrna, and then it has

1 the number 19?

2 A That's how old I was.

3 Q Okay. Then it says -- is that
4 approximately, those little squiggly signals?

5 A Yeah. 2012 through 2016, I worked there.
6 And then --

7 Q And what is this, 8, 20, 21 -- 18, 20 and
8 21?

9 A I worked there from 18 -- well, I worked
10 there when I was 18, 19, 20 and 21. And then at
11 North Druid Hills, I worked there from 18 to 23.

12 Q Oh, I get it. So that 19 is actually part
13 of this right here?

14 A Yes, yeah.

15 Q When did you start -- do you remember what
16 time of the year you started in 2012, at Smyrna?

17 A Yes, it was the day after we -- the month
18 I turned 18. It was [REDACTED], two thousand -- no,
19 I'm sorry. That's my birthday. It was -- it was
20 right after my birthday, like a week after my
21 birthday.

22 Q So March of 2012?

23 A Yes.

24 Q Okay. So March of 2012 through when in
25 2016 for Smyrna?

1 A I wouldn't know the exact month.

2 Q Well, what time of year?

3 A I'm not sure of that either.

4 Q Well, you went to jail, right?

5 A Yes, yes, sir.

6 Q So was it before or after jail?

7 A It was in the middle. Like I can't even
8 remember -- like I would have -- I couldn't know
9 the exact month, but I was there at that hotel.
10 Like I can't remember the exact month. I just know
11 I worked there a bunch.

12 Q You were arrested on April 12th of 2016
13 with a [REDACTED], at the Quality Inn in
14 Gwinnett County --

15 A Yes.

16 Q -- for prostitution?

17 A Yes.

18 Q And I think you pled guilty to that?

19 A I did, and he caught a pimping charge.

20 Q Okay. And I'm going to talk about that in
21 a minute. If you remember that -- I'm trying to
22 give you a date to work off of. So when you were
23 arrested in April of 2016 at the Quality Inn in
24 Gwinnett, does that help you figure out when in
25 2016 you stopped working at the Smyrna Red Roof?

1 A Not -- I just know I worked there on and
2 off, like between when I was 18 and from 2016, but
3 I didn't go back there really after that, the
4 Smyrna one. But I always went back to the North
5 Druid Hills one.

6 Q Ma'am, we'll talk about --

7 A I even have a picture of when I was in the
8 room and everything.

9 Q Okay. And I need to -- I'm trying to keep
10 these separate for the time being.

11 A Okay.

12 Q So if I've got this right, after you
13 caught the charge in 2016, April 12th, 2016, with
14 [REDACTED], at the Quality Inn in Gwinnett
15 County, you don't recall working out of Smyrna
16 again; is that fair?

17 A Yes.

18 Q Okay. But you do think that you worked
19 out of --

20 A Yes.

21 Q -- Druid Hills until sometime in 2018?

22 A Yes, sir.

23 Q All right. We'll get to -- we'll get to
24 2018 in a little bit.

25 All right. So we are talking about March

1 of 2012 to sometime before April of 2016, right?

2 A Yes.

3 Q Okay. And was [REDACTED] a/k/a AK -- I was
4 just going to say AK, but I get messed up. Was AK
5 the only trafficker that trafficked you during the
6 time that you were at the Red Roof in Smyrna?

7 A Yes.

8 Q Okay.

9 A In Smyrna.

10 Q [REDACTED] is listed as a trafficker.

11 A Wait.

12 Q Where did he traffic you?

13 A Well, he might have taken me to Smyrna,
14 too, but he really -- he took me to the North Druid
15 Hills one more, the one up on the hill.

16 Q Uh-huh.

17 A Yes.

18 Q Okay. Did you have multiple traffickers
19 at one time?

20 A No.

21 Q Okay. So --

22 A Well, they were in a gang. AK was in a
23 gang, like, on the east side.

24 Q The Bloods?

25 A Yes.

1 Q Okay. And then were you a member of that?

2 A Yes.

3 Q Okay. Because we've got a lot of pictures
4 of you wearing red and...

5 A (Witness nods head.)

6 Q How did you get initiated into the gang?

7 A When I was 17, he -- when I was 18, they
8 brought me in a room and they all did something to
9 me, and all his friends and everybody, when I was
10 18.

11 Q Did they beat you in or did they sex you
12 in?

13 A They just sexed me in at that time, but...

14 Q And how many guys?

15 A It was -- it was probably about three or
16 four, three or four or five people.

17 Q And what did they do to you?

18 A They just like -- they raped me. He told
19 them they could. They raped me and everything. He
20 said, "These are my friends. You have to do
21 something with them." And that was when I was 18.
22 And I really didn't -- I didn't know anything about
23 prostitution really until I was 18.

24 Q Okay. So you got -- was that before you
25 got -- was that before you started being

1 A No. The cop put his hands on me, went
2 like this (indicating). He put the -- this is the
3 first time it ever happened. He put the money on
4 the table, and they usually just come in, you know,
5 raid the room and come in after they put the money.

6 But he didn't. He went like this
7 (indicating), and he threw a false imprisonment
8 charge on me, a felony, because I blocked the door
9 for him and told him that he can't leave my room
10 because he did that.

11 And he was like, "Yes, I can, yes, I can."

12 So he put a false imprisonment charge on me that
13 got dropped. It got dropped because --

14 Q That was after 2018, right?

15 A Yeah, that would have been 2018. Those
16 charges got dropped. I told him I was going to
17 take it to trial, but it got dropped because it
18 wasn't a real -- it wasn't really a real charge.
19 That one wasn't.

20 Q The other ones were real, though?

21 A Yeah, I said -- yeah, I pleaded guilty to
22 prostitution, yes.

23 Q Because you were prostituting, right?

24 A Yes.

25 Q Okay. So how long did [REDACTED] traffic

1 you?

2 A All the way up until, like, 2014, '15.

3 Q Do you need this?

4 A And then I had met [REDACTED]

5 Q Do you need this exhibit?

6 A No. That's the one -- that's when I was
7 at the Red Roof in Smyrna and the North Druid
8 Hills.

9 Q Okay. All right. All right.

10 MR. KEITH: We've been going an hour. I
11 need to take a quick restroom break if we can do
12 that. So we're going to take a break. If you need
13 to take a break, you let us know. Don't stand up
14 before you take this off.

15 THE WITNESS: Oh, yeah.

16 THE VIDEOGRAPHER: Off the video record at
17 10:49 a.m.

18 (Recess from 10:49 to 11:07 a.m.)

19 THE VIDEOGRAPHER: Back on the video
20 record at 11:07 a.m. in the deposition of [REDACTED]
[REDACTED]

22 MR. KEITH: Thank you.

23 BY MR. KEITH:

24 Q What's your aunt's name that you're --
25 that you are living with or using her address right

1 now?

2 A [REDACTED].

3 Q [REDACTED]

4 A Yes, sir. Ju -- I mean, [REDACTED], and then

5 [REDACTED]

6 Q Okay. And whose sister is that?

7 A My mom's sister.

8 Q Okay. And your grandfather, what was his

9 name?

10 A [REDACTED].

11 Q And your grandmother?

12 A [REDACTED].

13 Q [REDACTED]

14 A Yes, sir.

15 Q Okay. Who is [REDACTED]?

16 A That was somebody that I was -- that
17 caught the pimping charge with me in 2016.

18 Q Is he related to you?

19 A No. He just has the same last name as my
20 family.

21 Q So yesterday we get the supplemental
22 discovery responses for the Varahi and the Red Roof
23 interrogatories. And on page 10 of Exhibit 2, you
24 have listed a [REDACTED] and a person named
25 Cap, C-a-p, as traffickers.

1 These are new names that were not on the
2 ones that we got in the interrogatory responses we
3 got back last year. Why were these two traffickers
4 added to the list of folks who trafficked you the
5 night before your deposition? Why did you not
6 remember them back the first time?

7 A Oh, because I thought he was -- I thought
8 [REDACTED] was kind of like my boyfriend, but he
9 really wasn't. He was just taking my money and
10 beating me in the room. He bruised both my eyes
11 and hit me if I didn't make any money. Like he
12 would tell me to wake up and make some money. That
13 was [REDACTED]

14 And then Cap, he was my -- he was the one
15 that -- he bonded me out in two thousand -- for
16 that charge, the first degree forgery charge.

17 Q The what, the forgery charge?

18 A Yeah. He bonded me out of that.

19 Q So when you answered these questions back
20 in June of 2021, you thought [REDACTED] was your
21 boyfriend; is that right?

22 A Yeah, but he really wasn't.

23 Q And then sometime between June of 2021 and
24 last night or yesterday afternoon, you came to the
25 revelation that [REDACTED] was actually a trafficker?

1 A No. I came to the revelation, like, just
2 as I got older, I realized that that was what he
3 was.

4 Q But that happened --

5 A He caught a pimping charge for me. It's
6 in the record.

7 Q Well, so sometime between June 29th of
8 2021 and April 13th of 2022, you came to the
9 revelation that [REDACTED] was a trafficker
10 and not your boyfriend; is that right?

11 A Yes.

12 Q Okay. What made you come to that
13 realization that [REDACTED] was not your boyfriend and
14 was instead a trafficker?

15 A Because I just realized that he was just
16 taking money from me, too. He wasn't -- he was
17 taking all my money. He wouldn't give me any of
18 it. And if I didn't give it to him, he would beat
19 me up.

20 Q And what about Cap? You didn't list him
21 as a trafficker back in June of 2021, but you
22 listed him yesterday as a trafficker.

23 A I guess because I didn't want to snitch.

24 Q How are you snitching if you just give me
25 the name Cap?

1 he told me that's what he wanted me to do, a dance
2 for him. And then the cops knocked on the door,
3 but he let me get naked and everything. And
4 usually, they don't let me do that. Usually, they
5 just put the money on the table and leave, like,
6 put the money on the table, and then open the door,
7 like, raid the room.

8 Q And you were pretty familiar with that,
9 right?

10 A Yes, sir.

11 Q Because that had happened to you a fair
12 number of times, right?

13 A Yes, sir.

14 Q All right. Did you ever think that
15 [REDACTED] was your boyfriend?

16 A I thought I was -- I thought I loved him
17 for a minute, but he wasn't really that. He had
18 other girls. And we never dated. Like he never
19 told me we were together.

20 Q Right.

21 A I just gave him my money.

22 Q You thought you loved him, though?

23 A Yeah, for a minute.

24 Q Because he saved you?

25 A He saved --

1 Q Got you out of a bad home life?

2 A That's what I thought, yeah. You know, I
3 didn't...

4 Q And how long were you with him?

5 A From about 2012, like on and off 2012
6 from -- to 2015 -- 2015.

7 Q Okay. And then when did [REDACTED] come in?

8 A 2015.

9 Q And then [REDACTED]

10 A 2016.

11 Q And Cap?

12 A 2018.

13 Q Who would you have for 2017?

14 A What happened in 2017?

15 Q Or were you in jail?

16 A I might have been in jail. But I was
17 on -- out on and off.

18 No, it was Cap. It was Cap 2017.

19 Q So who was your trafficker when you were
20 working out of Smyrna?

21 MR. ALLUSHI: Ms. [REDACTED] can you please
22 speak up a little bit so we can hear on this side
23 of the table?

24 THE WITNESS: Yes.

25 MR. ALLUSHI: Thank you.

1 A At the Smyrna Red Roof, I had both AK and
2 [REDACTED] bring me there.

3 BY MR. KEITH:

4 Q So --

5 A And I also had Cap bring me there. Cap
6 brought me to the -- like he brought me to the
7 North Druid and he brought me to -- I don't think
8 he brought me to the Smyrna one, but he brought me
9 to North Druid Hills. AK brought me to North Druid
10 Hills. [REDACTED] brought me to North Druid
11 Hills. And he also -- [REDACTED] also brought me to
12 Smyrna. And Cap --

13 Q Okay. Time out. Time out. Let's talk
14 about Smyrna.

15 A Okay.

16 Q All right. And then we'll go to North
17 Druid Hills.

18 A Okay.

19 Q Who took you -- who were you working for
20 when you were working out of Smyrna, just Smyrna,
21 okay?

22 A AK.

23 Q Okay. That's [REDACTED]

24 A Yes.

25 Q Okay, AK. What about [REDACTED]

1 A I worked there a couple of times with
2 [REDACTED], too.

3 Q But not [REDACTED] and not Cap?

4 A No, not at the Smyrna one.

5 Q Okay. Now, let's talk about -- okay. So
6 Smyrna is AK and [REDACTED] All right. And North
7 Druid Hills, if I heard you correctly, was all four
8 of them?

9 A Yes, sir.

10 Q Okay. Let's just go ahead and get those
11 dates down. The dates you wrote down on Exhibit 6
12 are 2012 to 2018 for North Druid Hills. So that
13 would mean that AK and [REDACTED] were -- you were
14 working for them from 2012 to 2015-ish, [REDACTED] for
15 2016, and Cap for 2017 and 2018?

16 A Yes.

17 Q Okay. What's [REDACTED] look like?

18 A He's 6'5". He's a Black guy. He's
19 actually out here in Gwinnett. I don't know. I
20 haven't -- I haven't talked to him in a long time.

21 Q What about Cap?

22 A I don't even know what happened to him.

23 Q What did he look like?

24 A He had glasses and he had -- he had a
25 front tooth missing. He had glasses. He's more

1 me, like he said, "No, you're not doing this
2 right."

3 And I know he's in a wheelchair, but
4 there's really not much he could do to me without
5 his friends being around, you know, so --

6 Q Except there were no friends around then,
7 right?

8 A No, not then, no, no, not that day. It
9 was just me and him. And then from then on, he --
10 I don't know. He just was my pimp from then on.

11 Q Okay. So when did he tell you or did he
12 ever tell you these guys are going to call you and
13 you're going to have sex with them and they're
14 going to give you money? When did --

15 A The first day I met him, like when he took
16 me to the room. After he bought me the outfit, he
17 took me to the room after that.

18 Q And what did he say? Do you remember it?

19 A Not really, no. I just remember that
20 he -- yeah, he gave me the phone, he said, "We're
21 about -- you just posted an ad. You're going to
22 make plays." And that's what he called it. He
23 said, "You're going to make plays. You're going to
24 use this phone. You're going to answer the phone,
25 answer all these people on your phone, just answer

1 them and tell them a price."

2 And I just remember I talk funny like
3 this, you know, like I talk weird. And then he was
4 like, "No, that's not how you talk," and then he
5 hit me. "That's not how you talk on the phone with
6 them."

7 So after that, I don't know, I was a
8 little weirded out, but I still stayed and I
9 worked. It was the first day. And then I worked
10 for him -- I don't know. I guess I was connected
11 to him after that.

12 Q Okay. I just -- I just don't understand
13 this. So he tells you to go talk to somebody on
14 the phone, and then he slaps you; is that right?

15 A Yes, sir.

16 Q Did it hurt?

17 A Yes, sir.

18 Q Did he only slap you once?

19 A Yes, sir. That's the only time he ever --
20 yeah.

21 Q That's the only time he ever slapped you?

22 A That's the only time he ever did. When
23 he, like, when he gang raped us, me and everything,
24 or the other girls, he would bring all the guys in
25 there with us and just gang rape us. That's how --

1 like one time when I was at the Red Roof, and this
2 was there, it was North Druid Hills, we were there,
3 and I just wanted \$20. I wanted \$20 so I could
4 eat.

5 Q You wanted or won \$20?

6 A Yeah, I wanted to keep -- I wanted to keep
7 \$20, so I kept \$20 on me. He saw it in the drawer
8 or one of the other girls -- like I can't remember.
9 One of the other girls had told him or told on me
10 that I kept the money. And he came in there, and
11 that's when they all came in there and raped me and
12 everything like that again. Like he did -- they've
13 done it multiple times, you know, just to show
14 their dominance, I guess. I don't know.

15 Q That was at the -- that was at North Druid
16 Hills?

17 A Yes.

18 Q Okay.

19 A That was the Red Roof.

20 Q Okay. So let's -- let me go back to
21 Masters Inn. So this -- how many guys did you have
22 sex with the first night?

23 A A lot. Like probably over 10 or 15 that
24 night.

25 Q Starting at 8:00?

1 A I thought it was going to be -- we were
2 going to get a -- like I thought we were going to
3 do more with it, like, but no. Like I thought that
4 I would be able to keep some of it sometimes, but
5 no, that's not how it works.

6 Q What did you think you were going to get
7 to do with it?

8 A I don't know. I thought we were going to
9 get a place or, you know, get a car, like get
10 stuff, get things, like move out. But no, you just
11 sit in an outfit in a room and make money for
12 people.

13 Q So when you got into it, you thought that
14 you were going to earn the money and you were going
15 to keep some of it and it was going to better you,
16 right?

17 A Yes, yes, sir.

18 Q And it turned out that was not what you
19 actually got, right?

20 A Yes, sir.

21 Q Now, how often, when you were with AK, did
22 you go to the Red Roof in Smyrna?

23 A A lot.

24 Q What does "a lot" mean?

25 A Not like -- he would -- he would take me

1 all over, like all over. So he took me there a
2 couple of times, but most of the time, I was at
3 North Druid Hills.

4 Q Okay. We'll talk about that. I'm trying
5 to -- I'm trying to -- let's make it -- let me ask
6 an easier question.

7 A All right.

8 Q As between the two Red Roof hotels, were
9 you at the -- were you at the Druid Hills more than
10 the Smyrna?

11 A Yes.

12 Q Okay. So take -- in your mind, I want you
13 to take out the Smyrna -- take out the Red Roof up
14 on the hill, okay?

15 A Okay.

16 Q And I want you to think about the Smyrna
17 one.

18 A Okay.

19 Q All right. And I want you to think about
20 AK, all right? How many times -- and I think you
21 said a couple, but I want to make sure we got this
22 right. How many times do you recall AK taking you
23 to the Smyrna Red Roof for you to work?

24 A Oh, like three to four times.

25 Q Okay.

1 A He didn't take me there much.

2 Q All right.

3 A He didn't take me to the Smyrna one much.

4 Q I'm going to put this up here so it
5 doesn't get in my pile and get away.

6 A He took me there on and off, but not too
7 much.

8 Q Okay. So I'm just going to write this
9 down. Smyrna with AK three to four times, right?

10 A Yeah, or maybe more. Like I'm not sure,
11 but it was just, like, over the years, he took me
12 there on and off. But yes, that's right. That's
13 right.

14 Q So does three to four sound right?

15 A I'm going to say yes.

16 Q Okay. All right. Now let's talk about
17 with CG. How many times did he take you to Smyrna?

18 A Twice maybe.

19 Q Twice. What's the other one's name that
20 I'm missing? [REDACTED]

21 A Once. No, I'm sorry. [REDACTED] never took
22 me to Smyrna.

23 Q Zero?

24 A Zero.

25 Q And our last one was Cap?

1 A Yes, sir.

2 Q And he never took you there, right?

3 A No.

4 Q Okay. Let's go through Druid Hills and
5 then we'll take a break, okay?

6 A (Witness nods head.)

7 Q So North Druid, AK, how many times did he
8 take you there?

9 A Way too many. Like, I'm serious, I'm
10 thinking like over 20. It had to be over 20, 30
11 times over the years.

12 Q So over 30 times?

13 A Yes, I think, yes.

14 Q Okay.

15 A Yes.

16 Q What about CG?

17 A Pretty much like the same, but he -- I
18 mean, he just took me to the nicer hotels, so 10 or
19 15.

20 Q Okay. [REDACTED]

21 A Once.

22 Q One time?

23 A No -- yeah, once, once with him.

24 Q Okay. And Cap?

25 A To be honest, I'm not sure if Cap -- I

1 can't really remember if Cap took us to that hotel
2 or not.

3 Q Say zero then?

4 A Yes, just say I can't remember.

5 Q Now, these three to four times that AK
6 took you to Smyrna, how long were the stays?

7 A Two to three days at a time.

8 Q Two to three days?

9 A And one time, I stayed there for a whole
10 month.

11 Q At Smyrna?

12 A Yes, sir. That was where I met Star. And
13 I saw the younger girls working in the other room.
14 They were like 14 years old.

15 Q All right. CG, how long -- the two times
16 that he took you there, how long were those stays?

17 A Two to three days at a time.

18 Q All right. Now, when AK took you to North
19 Druid, over the 30 times that you said, how long
20 were those stays?

21 A Two to three days. Maybe a week at a time
22 maybe.

23 Q Two to three to a week?

24 A Yes.

25 Q Okay. CG, the 10 to 15 times that he took

1 you to North Druid, how long?

2 A Same, two to three days at a time.

3 Maybe -- maybe a week.

4 Q And [REDACTED] the one time, how long was
5 that?

6 A Yeah. Just one, one day with him.

7 Q One day. The month that you stayed --
8 that you stayed at the Red Roof Smyrna with AK,
9 when was that?

10 A That was in two -- when I was 19 years
11 old.

12 Q So 2013?

13 A Yes, 2013.

14 Q Do you remember what month it was?

15 A No, sir.

16 Q Do you remember what time of the year it
17 was?

18 A Not sure, but I'm -- I'm not sure.

19 Q All right.

20 A I just know the year.

21 Q Okay.

22 MR. KEITH: That's a good breaking point.

23 THE VIDEOGRAPHER: Off the video record at
24 12:02 p.m. in the deposition of [REDACTED].

25 (Lunch from 12:02 to 1:10 p.m.)

1 times and something always -- something bad always
2 happened to you, and you got back into it?

3 A Yeah.

4 Q Is that fair?

5 A Yes, it is.

6 Q So there were plenty of times that you got
7 out and said, "I'm done; I don't want to do this
8 anymore," and then the next thing I see is you're
9 back at it?

10 A Yes.

11 Q Is that fair?

12 A Yes, that's true. Correct.

13 Q And if I'm hearing you right, you wanted
14 to get out at times?

15 A Yes.

16 Q But then money got tight, right? On some
17 instances, money got tight?

18 A I don't know if it was really money,
19 because I always made -- it was more of, I guess, a
20 love thing. It was more for the love than the
21 money. So I think I just thought someone loved me,
22 cared about me, I guess, which is stupid, like,
23 thinking they actually cared about me making me
24 work for them.

25 Q You were looking for a human connection;

1 Q -- big boy prison?

2 A Yes. They finally told me because of that
3 charge they were going to put me in prison if I
4 didn't go to rehab. So that totally made me
5 realize, okay, I really got to wake up because I
6 really didn't want to go to prison.

7 Q That literally got you right with the Lord
8 right there, right?

9 A Yeah.

10 Q Okay. All right. Let's go back to 2012.
11 You got into this thinking that you were going to
12 make some money and that you were going to keep
13 some money and that you were going to get to better
14 your life, right?

15 A Yes.

16 Q And it turns out that you were -- it turns
17 out that the way that this was going to happen was
18 you were going to be a sex worker, right?

19 A Yes, sir.

20 Q And how many men were you -- you told me
21 the first night you had sex with a lot of men. But
22 can you tell me on an average in -- over the course
23 of your prostitution and sex work, how many men you
24 were having sex with a day?

25 A Like 10 people a day.

1 Q 10 a day?

2 A Yes.

3 Q Was that all -- was that all manner of
4 sexual activities or was that -- tell me what that
5 means. What do you mean?

6 A Just -- I don't know. Just -- I don't
7 know how to really -- I don't know. Just -- I
8 don't know.

9 Q Were you having sex with 10 men a day?

10 A Yes, yes, yes.

11 Q How many days a week were you working?

12 A Seven days a week.

13 Q Did you get any -- and this sounds weird,
14 but did you get any holidays or vacation?

15 A I mean, I could take a day off where I
16 want to, but I usually just worked. I don't know.
17 They -- like when I was with CG and AK, they didn't
18 let me take a day off. They made me work. They
19 said we got to work.

20 Q I didn't understand you. I'm sorry. I
21 just didn't --

22 A When I was working for CG and AK, they
23 were like, you got to work. Like they just put me
24 in the room and say you got to work.

25 Q Were they beating you?

1 A Yes, multiple.

2 Q How were they beating you?

3 A AK had slapped me that one time. That was
4 the only time he ever did that other than the gang
5 rape stuff. But he's in a wheelchair, so...

6 But CG, he hit me one time because we
7 got -- we actually got kicked out of the room that
8 day because he hit me and, like, he made me -- I
9 got mad at him because I was giving him all my
10 money. And it was just -- I was feeling some type
11 of way. He was just coming to pick it up and then
12 leaving, coming to pick it up and then leaving, and
13 I guess we -- we got in a fight and he hit me.

14 Q So he hit you once?

15 A Yeah, just once.

16 Q AK hit you once?

17 A Just once with him.

18 Q You said the gang rape.

19 A Yeah, they --

20 Q So tell me -- tell me - and I know this --

21 A That was his friends.

22 Q Oh, right. Because -- and that was only
23 AK's friends, right?

24 A Yeah.

25 Q All right. I know this is going to be

1 difficult, but did that happen more than once?

2 A Yes.

3 Q How many times did that happen?

4 A It happened about twice.

5 Q I know the one time they sexed you in --

6 A Yes.

7 Q -- right?

8 And then you said it happened one time at
9 Druid Hills?

10 A Yes, Druid Hills, yes, that's right.

11 Q Okay. Never happened at Smyrna?

12 A No.

13 Q Okay. Have you ever been married?

14 A Never. I accidentally put this on.

15 Q Do what?

16 A I accidentally put this on my finger, but
17 I'm not married.

18 Q No, no. I'm just saying -- it's on my
19 list. It wasn't your ring. Have you ever been
20 engaged?

21 A Never.

22 Q Okay. I asked you earlier had -- did you
23 ask your momma for help. Did you ever ask your
24 sisters or your brother for help while you were in
25 the life?

1 A Yes, I do.

2 Q Do you recall having sex with anybody that
3 worked at the Druid Hills Red Roof?

4 A Yes, I do, because my trafficker, they
5 would ask him if we could see -- they would ask him
6 if he could see the girls that we are seeing over
7 there.

8 Q Okay. I'm going to go back one question,
9 okay? What you just described about North Druid
10 Hills, that never happened at Smyrna, right?

11 A No.

12 Q Correct?

13 A Yes.

14 Q Okay. All right.

15 A Only at the North Druid.

16 Q Okay. Did that happen at any other hotels
17 other than Red Roofs?

18 A Yes, it did.

19 Q Was that a somewhat regular occurrence
20 that the workers at the hotels would have sex with
21 you?

22 A Yes, yes, yes, it was.

23 Q And what were they -- and were they having
24 sex with you in exchange for the rooms or were they
25 just having sex because they wanted to have sex

1 Q And when you say "hot," what does that
2 mean?

3 A I mean, like everything goes on there.
4 Like everybody works there. There's girls in every
5 single room it seems like. There's pimps
6 everywhere.

7 I mean, it's the same as Norcross Extended
8 Stay, I would say. But this had to be the worst
9 ones, the Red Roof Inn North Druid Hills and the
10 Norcross Extended Stay on Pelican Drive would have
11 to be the worst hotels, that the most things go
12 down. But you don't ever get in trouble there.
13 They don't call the police over there.

14 Q At those two hotels you were just talking
15 about?

16 A No, they don't. No, no one ever gets in
17 trouble at the Red Roof.

18 Q Druid Hills?

19 A No, yeah, they never get in trouble there,
20 no.

21 Q And when you were --

22 A Or Smyrna, they don't get in trouble there
23 either.

24 Q Did you ever see the police driving
25 through in Smyrna?

1 A They do drive through, yes, yes.

2 Q What about at Druid Hills?

3 A Yes. They drive through less at Smyrna,
4 but yes, I've seen them drive through, I have.

5 Q They drove through somewhat regularly at
6 both hotels, didn't they?

7 A Uh-huh.

8 Q Yes?

9 A Yes, sir, they did.

10 Q I'm not trying to be rude.

11 A I know I didn't answer. I'm sorry.

12 Q That's okay. You're doing good.

13 A I'm sorry.

14 Q Hopefully, it's -- we're getting there.

15 Other than AK, [REDACTED]

[REDACTED] and Cap, did you ever have any other pimps?

17 A No, never. I'm sorry, that was not true.

18 But I had a bunch over in Norcross, but they
19 weren't -- I don't -- it was -- I don't know. It
20 was when I went through like eight different people
21 or eight pimps at one time. They were all beating
22 me up over there, but that was different.

23 Q What hotel was that?

24 A That was over in Gwinnett, over in the --
25 close to the Norcross Extended Stay and the Intown

1 Suites, over in that area. I can't remember the
2 name of the hotel, but that was over there.

3 Q So you were at a hotel where you had
4 multiple pimps?

5 A Oh, yeah, that one actually kept me in a
6 room and didn't let me go. I can't even -- I never
7 knew his name, but that wasn't at the -- that
8 wasn't the Red Roof. This is a different hotel.

9 Q How do you go about changing pimps?

10 A I don't know.

11 Q How did you go from changing pimps?

12 A I didn't really much.

13 Q Yeah, but you did. So how did you do it?
14 How did you go from -- how did you go from AK being
15 your pimp to CG?

16 A They met me on -- they met me on Backpage.
17 They send me a message on Backpage. All of them
18 did, except for AK, he met me on Facebook. And
19 then Cap, he met me when I was walking outside my
20 room. And then [REDACTED] he met me from sending me a
21 message on Backpage. And then he was really a coke
22 dealer and wanted --

23 Q He was what?

24 A He was really a cocaine dealer but...

25 Q Okay. So let's back up for a minute. All

1 A No, I was just working.

2 Q Right. Were you out flaunting yourself
3 half naked running around the property?

4 A Yes.

5 Q Okay. Why?

6 A I don't know. Sometimes I was. Like
7 sometimes -- I mean, I would wear little shorts out
8 there and everything and just walk around.

9 Q But were you trying --

10 A Sometimes. Most of the time I stayed in
11 the room because I didn't want anybody to see me.
12 So other times I'd walk around, yeah.

13 Q You weren't trying to pick up tricks out
14 in the parking lot, were you?

15 A No. I was on Backpage. But I have picked
16 up tricks in the parking lot before, yes, I have.

17 Q In Smyrna?

18 A Yes. I've picked them up in Smyrna and on
19 Delk Road, too. I've picked -- because I've met
20 people that were in different rooms there, because
21 I lived there for a month, so I met them there,
22 that's why I seen them. And then I would just see
23 them -- I would walk outside and maybe see a trick,
24 you know, someone would see me walking outside and
25 they'd come up to me.

1 I don't -- I still think the other hotels are bad,
2 too. I just think the Red Roof is just -- no one
3 gets in trouble there. Who's gotten in trouble?
4 No one. No one really gets in trouble there. Like
5 the police don't care to come and stop it there
6 like they did -- they stopped me at every other
7 one.

8 Q Well, but you jumped right back in the
9 game every time you got in trouble?

10 A Yes.

11 Q So it doesn't seem to matter if you got in
12 trouble, you were back in it?

13 A Yeah.

14 Q So in actuality, there's no difference
15 between these hotels and any of the other ones, are
16 there?

17 A I think there's a difference.

18 Q Well, what is the difference?

19 A It's just hot there. Like it's -- we used
20 to call it the hot Red Roof. Like everyone said
21 that.

22 Q And which one are you talking about?

23 A Like everybody on the streets called it
24 the hot -- the hot Red Roof because everyone just
25 stands outside the rooms and they don't really do

1 that much. They don't do that much. Like at the
2 Horizon, nobody really does that that much. Even
3 at the Norcross, they do, I will say that about
4 Norcross, and I will say that about the Red Roof
5 Inn in North Druid Hills. And Smyrna, I'm going to
6 have to say is not as bad as North Druid Hills.

7 Q But when it comes down to it, you were
8 able to peddle your wares at 15 different hotels
9 and some apartments that you've identified today,
10 right? You were able to -- yes?

11 A Wait, hold on. What did you say? You
12 said --

13 Q You were able to perform sex acts for
14 money at 15 different hotels that you've identified
15 today as well as at least one apartment complex,
16 right?

17 A Yes, sir.

18 Q You were only arrested at a handful --
19 well, not even a handful of those, just three or
20 four of those, right?

21 A Yes, sir.

22 Q You were able to have sex for money at all
23 of the hotels that you've identified, correct?

24 A Yes.

25 Q And not a single one of them stopped you

1 from doing it for any period of time, correct?

2 A Only the ones that I got arrested for, I
3 guess.

4 Q And then you jumped right back in the
5 game?

6 A I guess it's just by chance, to be honest,
7 but I don't know. I know I got -- I don't know. I
8 don't know to answer right now.

9 Q Not a single hotel stopped you from doing
10 it for any length of time because even the ones you
11 got arrested at --

12 A No, they did. They kicked me out. That's
13 what I told you, they kicked me out.

14 Q To go somewhere else to do it?

15 A What do you mean?

16 Q Not a single one of them got you out of
17 the life?

18 A No, no, no.

19 Q Only you could get you out of the life?

20 A Yes.

21 Q Correct?

22 A Yes.

23 Q So even the ones where you got arrested
24 and you spent some time in jail, within months
25 after getting out of jail, you were back at it with

1 a pimp doing the same things that you had been
2 doing that got you put in jail, right?

3 A Yes, yes.

4 Q And those were decisions that you made --

5 A Yes.

6 Q -- right?

7 A Yes.

8 Q Those were bad decisions that you made,
9 right?

10 A Yes.

11 Q They were terrible decisions that you
12 made?

13 A Yes.

14 Q But they were yours alone to make?

15 A I don't know how to answer that question.

16 Q Well, you always went back, didn't you?

17 A Yes.

18 Q You had a momma that had a house, right?

19 A Yes.

20 Q You had apparently a sister that had a
21 house, right?

22 A Yes.

23 Q You had an uncle that had a house?

24 A Yes.

25 Q And instead of staying with any of them,

1 A But I did -- they did do something to me
2 at the Red Roof when I took \$20.

3 Q And I'm going to get to that. Which hotel
4 was the first gang rape for initiation into the
5 Bloods?

6 A I think it was over at the Masters Inn.

7 Q And so -- and then so you testified that
8 then there was a -- I think it was a gang rape
9 where you wanted to keep \$20, I believe, and
10 then --

11 A Yes.

12 Q -- AK got mad at you and that's what
13 happened?

14 A Yes.

15 Q And was that at the North Druid Hills?

16 A Yes.

17 Q And what year was that?

18 A That was in two thousand -- I think 2013.

19 Q And do you recall how long you had been
20 staying at the Red Roof Inn North Druid Hills at
21 that time?

22 A Probably for like two to three days at a
23 time.

24 Q Is that what your usual -- I know you
25 testified earlier you stayed a month at the Smyrna.

1 Is the North Druid Hills two to three days at a
2 time?

3 A Yeah. North Druid Hills was two to three
4 days at a time, maybe a week.

5 Q And I know you said -- you said earlier it
6 was hot, hot. Is it hot like there's a lot of
7 police or is it hot that there's like --

8 A There's a lot of stuff going on there.
9 There's like a lot of people working there. A lot
10 of girls that I've seen in the rooms. And I've,
11 you know, seen some girls there that worked there.
12 And there's a lot of people, you know, selling
13 drugs there and so forth.

14 Q Now, when this gang rape happened in 2013,
15 was it inside the room that --

16 A Yes.

17 Q -- the rape happened?

18 A Yes.

19 Q Was it also inside the room that the
20 incident with the \$20 happened?

21 A Yes, that was the same incident.

22 Q And was any hotel employees around to
23 witness that?

24 A No, I don't think so.

25 Q Okay. Did you -- did you call the police

1 Q And how many times would you stay -- would
2 you say you stayed at the Red Roof North Druid
3 Hills in 2012?

4 A Let me think. I'm going to have to say
5 like 14, 15.

6 Q 14, 15 times?

7 A Yeah, or maybe a little more.

8 Q In 2012?

9 A Yes.

10 Q What about in 2013?

11 A Same amount of time, like same amount.

12 Q Okay. What about --

13 A We'd just go there like every month, like
14 on and off, like we would switch and go back every
15 other month, every other month.

16 Q And what about 2014, same?

17 A Yeah, same.

18 Q Is it the same every year?

19 A Yeah, like just switching it off over the,
20 like, over the years, switching hotels.

21 Q So it was 14 to 15 times each year three
22 times -- three nights average?

23 A Yes.

24 Q And so how many you think occurrences
25 where you had sex with workers throughout those six

1 years?

2 A Probably two, three, maybe four times that
3 I had sex with, like, the Indian people that worked
4 there.

5 Q Two to four times --

6 A Yes.

7 Q -- with Indian people that worked there?

8 A Yes, or the cleaning people that worked
9 there. They would come in the room, and they would
10 offer my pimp to see us. I mean, they would ask
11 and then he would get the money and we would see
12 them.

13 Q Okay. And so it's two to four people,
14 correct?

15 A Yes.

16 Q And can you describe each of these people
17 to me, please?

18 A The Indian people, like, there was just --
19 one of them was -- I remember one time, he was
20 bald, and he was just a front desk worker. And
21 when I went -- when I went up there, like, with
22 him, he tried to talk to me. And we did. We ended
23 up -- he ended up seeing me.

24 Q Okay. First guy, was this the first
25 guy --

1 used?

2 A Huh-uh, don't even know that.

3 Q Let me ask you this: I want to confirm
4 the testimony you gave us earlier for North Druid
5 Hills because it was unclear to me. But you allege
6 that you were there with AK, correct?

7 A Yeah.

8 Q About 30 times maybe?

9 A Yes.

10 Q And then you said that you were there with
11 CG, which is [REDACTED], correct?

12 A Yeah.

13 Q About 15 times?

14 A Yes.

15 Q And then you said that you were there with
16 [REDACTED] one time?

17 A Yes.

18 Q But you've never been there with Cap,
19 right?

20 A No.

21 Q Okay. Now, this guy, [REDACTED], this
22 is the guy you said earlier he's a baseball coach
23 for kids, right?

24 A Yes.

25 Q I mean -- and you knew that at the time?

1 A Yes.

2 Q Did you ever think, like, this guy's
3 terrible, I should call the police, he shouldn't be
4 allowed to be teaching kids?

5 A Yes, I think that, too. And he has a
6 whole life. Nobody even knows about his other
7 life.

8 Q But you knew at the time this guy is a
9 pimp and he's -- you testified he was beating you,
10 mistreating you, correct?

11 A Yes.

12 Q And then he was going during the day and
13 teaching people's kids, right?

14 A Yes.

15 Q And you never thought, hey, let me just
16 call the police and make sure that this guy never
17 gets near kids with what he's doing?

18 A Now I did, and that's why I'm --

19 Q And why --

20 A I never gave their names till now. I
21 never -- I never snitched on anybody until I
22 realized -- until I came into the other life and
23 realized all of it is wrong.

24 Q So at the time, you didn't think it was
25 wrong that this guy is teaching kids?

1 A No, I did think it was wrong then. I've
2 always thought it was weird that he did all that.
3 Like he had a good life. Like he lived in a
4 mansion. He was teaching kids baseball. He's -- I
5 don't know.

6 Q Yeah. And so my question is: Why didn't
7 you call the police or somebody to warn them that
8 this guy is a pimp, violent, a trafficker, and he
9 shouldn't be allowed near kids?

10 A I don't know, because I guess I was -- had
11 a connection then.

12 Q Were you in love with this guy?

13 A I don't think in love, just like -- we
14 never dated. Like he never said we were dating.

15 Q Did you have sex with him?

16 A Yes.

17 Q And that was consensual?

18 A Yes.

19 Q Aside from the four Indian guys, did you
20 have sex with any other employees at the Red Roof
21 North Druid Hills?

22 A I don't think so, but...

23 Q Okay. And then you also said -- testified
24 earlier, Ms. [REDACTED] that there were people,
25 workers, that served as lookouts at the North Druid

1 Hills.

2 A Yes. Like they would tell us -- they
3 would call the room and let us know if the police
4 were coming, or they would call my trafficker and
5 let them know, or my pimp and let him know, either
6 one, they let them know that they're coming to the
7 room.

8 Q And how many of these workers did that?

9 A Only one like or two -- one, I think it
10 was one at that time.

11 Q So it was one -- one where --

12 A That I can remember of, yes.

13 Q Okay.

14 A But it was --

15 Q Go ahead.

16 A -- a bunch of times. It happened a couple
17 of times.

18 Q Okay. One worker at North Druid Hills a
19 few times --

20 A Yes, yes.

21 Q -- alerted you or alerted --

22 A The person, the pimp, like he would make
23 friends with them.

24 Q Which was who at the time?

25 A AK and [REDACTED] both. They both made

1 friends with them. That's just what a lot of them
2 did, the pimps.

3 Q And do you recall this person's name, the
4 worker's name?

5 A No.

6 Q What did he -- what did he look like?

7 A I can't recall any names or what they
8 looked like at this -- right now.

9 Q Okay.

10 A Because everybody looked the same to me
11 after a while.

12 Q And how do you know that he alerted AK or
13 CG?

14 A Because he had told me about it. He said,
15 "Don't work right now." He -- they said --

16 Q "He" who?

17 A AK and [REDACTED] they both looked at me,
18 "Don't work right now." They said, "There's about
19 to be a sting up at the front office." Like they
20 would call their phones and let them know.

21 Q But you directly did not talk to this
22 worker, right? You just -- you just have this
23 secondhand knowledge from --

24 A Yes, yes.

25 Q -- AK and [REDACTED] that said that, hey,

1 Roof Inn Smyrna at times?

2 A Yes, yes.

3 Q What about the Red Roof North Druid Hills,
4 did you go to the front desk?

5 A Yes, picking up towels, like so why they
6 didn't ever come to the room, yeah.

7 Q And would you go to the front desk -- you
8 said you don't recall ever having the room in your
9 name, so what would you have gone to the front desk
10 for?

11 A To get towels, just, like, so if I run out
12 of toilet paper or something like that, just -- I
13 would get that.

14 Q And they wouldn't deliver that to your
15 room? You couldn't call?

16 A They could, but sometimes I would run out
17 more because I was seeing so many people, I had to
18 switch towels a lot.

19 Q And when you check in, and now I'm talking
20 about both hotels, the Smyrna and the North Druid
21 Hills, when you would check -- when you would --
22 when you would go into the hotel, right, these
23 hotels were outdoor courtyard hotels, correct?

24 A Which one?

25 Q The Smyrna and the North Druid Hills, they

1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the
6 caption, and the colloquies, questions and answers
7 were reduced to typewriting under my direction;
8 that the transcript is a true and correct record of
9 the evidence given upon said proceeding.

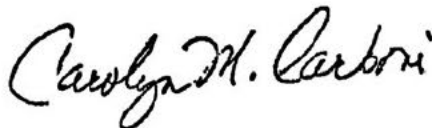
10 I further certify that I am not a relative
11 or employee or attorney of any party, nor am I
12 financially interested in the outcome of this
13 action.

14 I have no relationship of interest in this
15 matter which would disqualify me from maintaining
16 my obligation of impartiality in compliance with
17 the Code of Professional Ethics.

18 I have no direct contract with any party
19 in this action and my compensation is based solely
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this
22 proceeding impacts my absolute commitment to serve
23 all parties as an impartial officer of the court.

24 This the 26th day of April, 2022.

25 

CAROLYN M. CARBONI, RPR, RMR, CCR-B-878